

SDB/DAJ/MBZ: USAO 2009R00549

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MAY 02 2012
AT GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

MATT NICKA,

a/k/a Anthony Thacker,

a/k/a Grump,

a/k/a Matt Smith,

a/k/a Matt Marino,

a/k/a Matt St. John,

a/k/a Morrow,

a/k/a Calvin Bartlett,

a/k/a Matthew Johnson,

a/k/a Surfer Dude,

GRETCHEN PETERSON,

a/k/a Bella,

a/k/a Dispatch,

DAVID D'AMICO,

a/k/a Joe Bono,

a/k/a O.D.B.,

a/k/a John Franklin,

a/k/a John Frankland,

a/k/a Captain Jack,

a/k/a Mark Peters,

JEFFREY PUTNEY,

a/k/a Jeffy,

a/k/a Tom,

a/k/a J.P.,

KEEGAN LEAHY,

IAN TRAVIS MINSHALL,

MICHAEL PHILLIPS,

DANIEL McINTOSH,

a/k/a Barfly,

a/k/a B-Fly,

ANTHONY MARCANTONI,

a/k/a Mr. Purple,

a/k/a The Italian, and

RYAN FORMAN,

Defendants

CRIMINAL NO. RWT-10-0777

(Conspiracy to Distribute and Possess
with Intent to Distribute 1000 Kilograms
or More of Marijuana, 21 U.S.C. § 846;
Money Laundering Conspiracy,
18 U.S.C. § 1956(h); Maintaining
Drug-Involved Premises, 21 U.S.C.
§ 856; Travel Act, 18 U.S.C. § 1952;
Distribution and Possession with Intent
to Distribute Marijuana, 21 U.S.C. § 841;
Money Laundering, 18 U.S.C.
§§ 1956(a)(1)(B)(1) and (a)(1)(A)(1);
Aiding and Abetting, 18 U.S.C. § 2;
Forfeiture, 21 U.S.C. § 853, 18 U.S.C.
§ 982(a)(1))

SECOND SUPERSEDING
INDICTMENT

COUNT ONE

The Grand Jury for the District of Maryland charges that:

1. Between a time unknown to the Grand Jury, but no later than in or about 2001, and in or about January 2011, in the District of Maryland and elsewhere, the defendants,

MATT NICKA,
a/k/a Anthony Thacker,
a/k/a Grump,
a/k/a Matt Smith,
a/k/a Matt Marino,
a/k/a Matt St. John,
a/k/a Morrow,
a/k/a Calvin Bartlett,
a/k/a Matthew Johnson,
a/k/a Surfer Dude,
GRETCHEN PETERSON,
a/k/a Bella,
DAVID D'AMICO,
a/k/a Joe Bono,
a/k/a O.D.B.,
a/k/a John Franklin,
a/k/a John Frankland,
a/k/a Captain Jack,
JEFFREY PUTNEY,
a/k/a Jeffy,
a/k/a Tom,
a/k/a J.P.,
KEEGAN LEAHY,
IAN TRAVIS MINSHALL,
MICHAEL PHILLIPS,
DANIEL McINTOSH,
a/k/a Barfly,
a/k/a B-Fly,
ANTHONY MARCANTONI,
a/k/a Mr. Purple,
a/k/a The Italian, and
RYAN FORMAN,

did knowingly conspire with one another, Andrew Sharpeta, a/k/a Ken Thomas, a/k/a Bird,

Sean Costello, a/k/a Chong, Jeremiah Landsman, a/k/a Jeremy Landsman, Daniel

Fountain, a/k/a Danny Boy, Adam Constantinides, a/k/a Matthew Thomas Anderson, a/k/a Mike, a/k/a Ted, a/k/a A.D.D., Joseph Spain, a/k/a Goose, and other persons known and unknown to the Grand Jury to distribute and possess with intent to distribute 1000 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of 21 U.S.C. § 841.

Manner and Means of the Conspiracy

2. It was part of the conspiracy that defendants and coconspirators obtained and transported large quantities of marijuana grown in Canada and northern California to warehouses in Maryland, where the marijuana was received and divided for distribution in Maryland, Pennsylvania, Louisiana, Kansas, Florida, Ohio, North Carolina, Georgia, and elsewhere.

3. It was further part of the conspiracy that the defendants and coconspirators arranged to transport marijuana and bulk currency payments via aircraft, tractor trailers, commercial carrier, trains and other vehicles, including at least one vehicle containing a trap device to secrete items for transport.

4. It was further part of the conspiracy that the defendants and coconspirators stored marijuana in warehouses, vehicles and a storage unit, and purchased and rented residences that were used to store and distribute marijuana and to count and collect cash proceeds from the marijuana sales.

5. It was further part of the conspiracy that the defendants and coconspirators used multiple cellular telephones to communicate and to avoid detection by law enforcement and used aliases and false identifications to conceal their activities and identities and the source, ownership and control of proceeds from distributing marijuana.

6. It was further part of the conspiracy that the defendants and coconspirators would and did perform various tasks to obtain and distribute marijuana, including but not limited to the following:

a. Defendant **MATT NICKA**, a/k/a **Anthony Thacker**, a/k/a **Grump**, a/k/a **Matt Smith**, a/k/a **Matt Marino**, a/k/a **Matt St. John**, a/k/a **Morrow**, a/k/a **Calvin Bartlett** ("**NICKA**") supervised and directed other conspirators' activities, recruited conspirators and obtained large quantities of marijuana in exchange for bulk currency payments.

b. Defendant **DAVID D'AMICO**, a/k/a **Joe Bono**, a/k/a **O.D.B.**, a/k/a **John Franklin**, a/k/a **John Frankland**, a/k/a **Captain Jack** ("**D'AMICO**") and coconspirator **Andrew Sharpeta**, a/k/a **Ken Thomas**, a/k/a **Bird** ("**Sharpeta**") oversaw day-to-day operations, collected and bundled monies, arranged for the transportation and storage of marijuana, received orders for marijuana and transported bulk currency to marijuana suppliers.

c. Defendant **GRETCHEN PETERSON**, a/k/a **Bella** ("**PETERSON**") received orders for and delivered marijuana, arranged for deliveries to mid-level dealers, and transported currency.

d. Defendant **JEFFREY PUTNEY**, a/k/a **Jeffy**, a/k/a **Tom**, a/k/a **J.P.** ("**PUTNEY**") picked up and delivered marijuana, unloaded large shipments of marijuana, and accessed residences and storage units where marijuana was kept.

e. Defendants **D'AMICO**, **KEEGAN LEAHY** ("**LEAHY**"), **RYAN FORMAN** ("**FORMAN**") and coconspirator **Sean Costello**, a/k/a **Chong** ("**Chong**") facilitated the purchase, operation and rental of planes for transporting marijuana and currency.

- f. Defendant **LEAHY** piloted planes used to transport marijuana and currency.
- g. Coconspirator **Costello** transported marijuana.
- h. Defendants **IAN TRAVIS MINSHALL ("MINSHALL")** and **MICHAEL PHILLIPS ("PHILLIPS")** and coconspirators **Daniel Fountain, a/k/a Danny Boy ("Fountain")**, **Adam Constantinides, a/k/a Matthew Thomas Anderson, a/k/a Mike, a/k/a Bossman, a/k/a Ted, a/k/a A.D.D. ("Constantinides")** served as mid-level dealers and distributors.
- i. Coconspirator **Jeremiah Landsman, a/k/a Jeremy Landsman ("Landsman")** distributed marijuana, brokered other conspirators' purchases of marijuana and maintained several properties used for marijuana distribution.
- j. Coconspirator **Joseph Spain, a/k/a Goose ("Spain")** drove tractor trailers used to transport marijuana and bulk currency.
- k. Defendant **DANIEL McINTOSH, a/k/a Barfly, a/k/a B-fly ("McINTOSH")**, owned or partially owned bars in Baltimore, including but not limited to 407 Saratoga Inc., doing business as Sonar, and distributed large quantities of marijuana. Defendant **McINTOSH** facilitated shipments of marijuana to Maryland, picked up and delivered marijuana once it arrived in Maryland, and unloaded large shipments of marijuana.
- l. Defendant **ANTHONY MARCANTONI, a/k/a Mr. Purple ("MARCANTONI")**, owned or partially owned Ground Control Owings Mills LLC, doing business as Ground Control in Reisterstown, Maryland, and distributed large quantities of marijuana. Defendant **MARCANTONI** used Ground Control to facilitate the drug business,

including as a location to receive and deliver large quantities of marijuana and bulk currency payments.

m. Defendant **FORMAN** introduced, recruited and attempted to recruit individuals to purchase large quantities of marijuana from **NICKA** and his associates.

21 U.S.C. § 846

COUNT TWO

The Grand Jury for the District of Maryland further charges that:

1. From a time unknown to the Grand Jury but beginning prior to in or about 2003 until at least in or about August 2009, in the District of Maryland and elsewhere, the defendants,

MATT NICKA,
a/k/a Anthony Thacker,
a/k/a Grump,
a/k/a Matt Smith,
a/k/a Matt Marino,
a/k/a Matt St. John,
a/k/a Morrow,
a/k/a Calvin Bartlett,
a/k/a Matthew Johnson,
a/k/a Surfer Dude,
GRETCHEN PETERSON,
a/k/a Bella,
DAVID D'AMICO,
a/k/a Joe Bono,
a/k/a O.D.B.,
a/k/a John Franklin,
a/k/a John Frankland,
a/k/a Captain Jack,
KEEGAN LEAHY,
DANIEL McINTOSH,
a/k/a Barfly,
a/k/a B-Fly, and
RYAN FORMAN,

did knowingly conspire with each other, Andrew Sharpeta, a/k/a Ken Thomas, a/k/a Bird, Sean Costello, a/k/a Chong, Jeremiah Landsman, a/k/a Jeremy Landsman, Daniel Fountain, a/k/a Danny Boy and Adam Constantinides, a/k/a Matthew Thomas Anderson, a/k/a Mike, a/k/a Ted, a/k/a A.D.D., and other persons known and unknown to the grand jury to conduct and attempt to conduct financial transactions which in fact involved the proceeds of specified unlawful activity – to wit, conspiracy to distribute and possession with intent to

distribute controlled substances, in violation of Title 21, United States Code, Section 846, and distribution and possession with intent to distribute controlled substances in violation of Title 21, United States Code, Section 841— while knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity and

a. with the intent to promote the carrying on of specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(A)(i); and

b. knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of said specified unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

Manner and Means of the Money Laundering Conspiracy

5. It was part of the conspiracy that defendants and coconspirators used aliases and false identifications and created and used shell corporations to hold and hide assets, conduct financial transactions, title vehicles, convert assets, hide true ownership and the identity of conspirators, and disguise the nature, source, and control of those assets.

6. It was further part of the conspiracy that defendants and coconspirators purchased and used financial instruments, including but not limited to money orders, and transferred funds among accounts at multiple financial institutions to promote the distribution of marijuana and conceal that funds were derived from drug proceeds.

7. It was further part of the conspiracy that defendants and their conspirators used third parties to conduct financial transactions.

8. It was further part of the conspiracy that defendants and their conspirators rented storage and warehouse facilities that were then used in furtherance of the drug conspiracy.

9. It was further part of the conspiracy that defendants and their conspirators used drug proceeds to purchase and renovate real property that was used to conceal the source of assets and to further the drug conspiracy.

10. It was further part of the conspiracy that defendants and their conspirators structured financial transactions between each other and other persons to evade Internal Revenue Service ("IRS") filing requirements for transactions involving more than \$10,000 in cash payments in a single transaction, and thereby further conceal from the government large cash transactions by drug dealers.

18 U.S.C. § 1956(h)

COUNT THREE

The Grand Jury for the District of Maryland further charges that:

On or about July 31, 2007, in the District of Maryland and elsewhere, the defendants,

**MATT NICKA,
a/k/a Anthony Thacker,
a/k/a Grump,
a/k/a Matt Smith,
a/k/a Matt Marino,
a/k/a Matt St. John,
a/k/a Morrow,
a/k/a Calvin Bartlett,
a/k/a Matthew Johnson,
a/k/a Surfer Dude, and
DANIEL McINTOSH,
a/k/a Barfly,
a/k/a B-Fly,**

did knowingly conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, namely the wire transfer of funds to purchase sound equipment for Sonar, which involved the proceeds of a specified unlawful activity – to wit, conspiracy to distribute and possession with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, and distribution and possession with intent to distribute controlled substances in violation of Title 21, United States Code, Section 841– knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

18 U.S.C. § 1956(a)(1)(B)(i)
18 U.S.C. § 2

COUNT FOUR

The Grand Jury for the District of Maryland further charges that:

Between on or about August 31, 2007 and in or about March 2009, in the District of Maryland, the defendants,

**MATT NICKA,
a/k/a Anthony Thacker,
a/k/a Grump,
a/k/a Matt Smith,
a/k/a Matt Marino,
a/k/a Matt St. John,
a/k/a Morrow,
a/k/a Calvin Bartlett,
a/k/a Matthew Johnson,
a/k/a Surfer Dude, and
GRETCHEN PETERSON,
a/k/a Bella,**

knowingly used and maintained a place at 4210 Clarkdale Road, Baltimore, Maryland, for the purpose of distributing and using marijuana, a Schedule I controlled substance.

21 U.S.C. § 856(a)(1)

18 U.S.C. § 2

COUNT FIVE

The Grand Jury for the District of Maryland further charges that:

In or about 2008, in the District of Maryland, the defendant,

DANIEL McINTOSH,

a/k/a Barfly,

a/k/a B-Fly,

knowingly opened, used, and maintained a place on Weldon Avenue, in Baltimore, Maryland, for the purpose of distributing and using marijuana, a Schedule I controlled substance.

21 U.S.C. § 856(a)(1)

18 U.S.C. § 2

COUNT SIX

The Grand Jury for the District of Maryland further charges that:

Between in or about 2008 and in or about March 2009, in the District of Maryland, the defendants,

**MATT NICKA,
a/k/a Anthony Thacker,
a/k/a Grump,
a/k/a Matt Smith,
a/k/a Matt Marino,
a/k/a Matt St. John,
a/k/a Morrow,
a/k/a Calvin Bartlett,
a/k/a Matthew Johnson,
a/k/a Surfer Dude, and
DANIEL McINTOSH,
a/k/a Barfly,
a/k/a B-Fly,**

did manage and control a place at 407 East Saratoga Street, in Baltimore, Maryland, d/b/a Sonar, and did knowingly and intentionally make said place available for use, for the purpose of unlawfully storing, distributing and using marijuana, a Schedule I controlled substance.

21 U.S.C. § 856(a)(2)
18 U.S.C. § 2

COUNT SEVEN

The Grand Jury for the District of Maryland further charges that:

Between in or about May 2008 and in or about December 2008, in the District of Maryland and elsewhere, the defendant,

DANIEL McINTOSH,
a/k/a Barfly,
a/k/a B-Fly,

traveled and caused to travel in interstate commerce and used and caused to use a facility in interstate commerce, by travel between Maryland and California, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving controlled substances (as defined in section 102(6) of the Controlled Substances Act), and thereafter did perform or attempt to perform an act to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity.

18 U.S.C. § 1952
18 U.S.C. § 2

COUNT EIGHT

The Grand Jury for the District of Maryland further charges that:

On or about July 15, 2008, in the District of Maryland and elsewhere, the defendants,

**DAVID D'AMICO,
a/k/a Joe Bono,
a/k/a O.D.B.,
a/k/a John Franklin,
a/k/a John Frankland,
a/k/a Captain Jack,
KEEGAN LEAHY, and
RYAN FORMAN,**

did unlawfully, willfully, and knowingly conduct and attempt to conduct a financial transaction, namely the purchase of and transfer of title to a 2000 Lancair IV-P aircraft through the holding company Air Sky Holdings LLC, which in fact involved the proceeds of specified unlawful activity – to wit, conspiracy to distribute and possession with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, and distribution and possession with intent to distribute controlled substances in violation of Title 21, United States Code, Section 841 – with the intent to promote the carrying on of specified unlawful activity and while knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

18 U.S.C. § 1956(a)(1)(A)(i)

18 U.S.C. § 2

COUNT NINE

The Grand Jury for the District of Maryland further charges that:

Between in or about October 2008 and in or about March 2009, in the District of Maryland, the defendants,

**DAVID D'AMICO,
a/k/a Joe Bono,
a/k/a O.D.B.,
a/k/a John Franklin,
a/k/a John Frankland,
a/k/a Captain Jack, and
JEFFREY PUTNEY,
a/k/a Jeffy,
a/k/a Tom,
a/k/a J.P.,**

knowingly opened, leased, rented, used and maintained a place at 3522 Hickory Avenue, Baltimore, Maryland, for the purpose of distributing and using marijuana, a Schedule I controlled substance.

21 U.S.C. § 856(a)(2)
18 U.S.C. § 2

COUNT TEN

The Grand Jury for the District of Maryland further charges that:

Between in or about December 2008 and in or about March 2009, in the District of Maryland, the defendants,

**MATT NICKA,
a/k/a Anthony Thacker,
a/k/a Grump,
a/k/a Matt Smith,
a/k/a Matt Marino,
a/k/a Matt St. John,
a/k/a Morrow,
a/k/a Calvin Bartlett,
a/k/a Matthew Johnson,
a/k/a Surfer Dude, and
IAN TRAVIS MINSHALL,
a/k/a Travis,**

while managing and controlling a place at 3835 Falls Road, Baltimore, Maryland, as an owner, lessee, agent, employee, occupant and mortgagee, knowingly and intentionally rented, leased profited from, and made available for use, said place for the purpose of unlawfully storing and distributing marijuana, a Schedule I controlled substance.

21 U.S.C. § 856(a)(2)
18 U.S.C. § 2

COUNT ELEVEN

The Grand Jury for the District of Maryland further charges that:

In or about January 2009, in the District of Maryland and elsewhere, the defendants,

**MATT NICKA,
a/k/a Anthony Thacker,
a/k/a Grump,
a/k/a Matt Smith,
a/k/a Matt Marino,
a/k/a Matt St. John,
a/k/a Morrow,
a/k/a Calvin Bartlett,
a/k/a Matthew Johnson,
a/k/a Surfer Dude, and
DAVID D'AMICO,
a/k/a Joe Bono,
a/k/a O.D.B.,
a/k/a John Franklin,
a/k/a John Frankland,
a/k/a Captain Jack,**

traveled and caused to travel in interstate commerce and used and caused to use a facility in interstate commerce, by travel between Maryland and California, with the intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving controlled substances and controlled substances (as defined in section 102(6) of the Controlled Substances Act), and thereafter did perform or attempt to perform an act to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity.

18 U.S.C. § 1952

18 U.S.C. § 2

COUNT TWELVE

The Grand Jury for the District of Maryland further charges that:

In or about March 2009, in the District of Maryland and elsewhere, the defendants,

**GRETCHEN PETERSON,
a/k/a Bella, and
MICHAEL PHILLIPS,**

traveled and caused to travel in interstate commerce and used and caused to use a facility in interstate commerce, by travel between Pennsylvania and Maryland, with intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving controlled substances (as defined in section 102(6) of the Controlled Substances Act), and thereafter did perform or attempt to perform an act to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity.

18 U.S.C. § 1952

18 U.S.C. § 2

COUNT THIRTEEN

The Grand Jury for the District of Maryland further charges that:

On or about March 5, 2009, in the District of Maryland and elsewhere, the defendants,

**MATT NICKA,
a/k/a Anthony Thacker,
a/k/a Grump,
a/k/a Matt Smith,
a/k/a Matt Marino,
a/k/a Matt St. John,
a/k/a Morrow,
a/k/a Calvin Bartlett,
a/k/a Matthew Johnson,
a/k/a Surfer Dude, and
DAVID D'AMICO,
a/k/a Joe Bono,
a/k/a O.D.B.,
a/k/a John Franklin,
a/k/a John Frankland,
a/k/a Captain Jack,**

did knowingly, intentionally and unlawfully possess with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

21 U.S.C. § 841

18 U.S.C. § 2

COUNT FOURTEEN

The Grand Jury for the District of Maryland further charges that:

On or about March 18, 2009, in the District of Maryland and elsewhere, the defendants,

**DAVID D'AMICO,
a/k/a Joe Bono,
a/k/a O.D.B.,
a/k/a John Franklin,
a/k/a John Frankland,
a/k/a Captain Jack, and
KEEGAN LEAHY,**

traveled and caused to travel in interstate commerce and used and caused to use a facility in interstate commerce, by travel between Maryland and California, with intent to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of an unlawful activity, said unlawful activity being a business enterprise involving controlled substances (as defined in section 102(6) of the Controlled Substances Act), and thereafter did perform or attempt to perform an act to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of said unlawful activity.

18 U.S.C. § 1952
18 U.S.C. § 2

COUNT FIFTEEN

The Grand Jury for the District of Maryland further charges that:

On or about March 18, 2009, in the District of Maryland and elsewhere, the defendants,

MATT NICKA,
a/k/a Anthony Thacker,
a/k/a Grump,
a/k/a Matt Smith,
a/k/a Matt Marino,
a/k/a Matt St. John,
a/k/a Morrow,
a/k/a Calvin Bartlett,
a/k/a Matthew Johnson,
a/k/a Surfer Dude,
DAVID D'AMICO,
a/k/a Joe Bono,
a/k/a O.D.B.,
a/k/a John Franklin,
a/k/a John Frankland,
a/k/a Captain Jack, and
JEFFREY PUTNEY,
a/k/a Jeffy,
a/k/a Tom,
a/k/a J.P.,

did knowingly, intentionally and unlawfully distribute and possess with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

21 U.S.C. § 841

18 U.S.C. § 2

COUNT SIXTEEN

The Grand Jury for the District of Maryland further charges that:

Between in or about September 2010 and on or about October 7, 2010, in the District of Maryland, the defendant,

ANTHONY MARCANTONI,
a/k/a Mr. Purple,

did knowingly, intentionally and unlawfully distribute and possess with intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

21 U.S.C. § 841
18 U.S.C. § 2

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further charges that:

1. Pursuant to Fed. R. Crim. P. 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with Title 21, United States Code, Section 853, and Title 18, United States Code, Section 982(a)(1), in the event of the defendants' convictions under Counts One through Sixteen of this Second Superseding Indictment.

Drug Forfeiture

2. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of an offense in violation of the Controlled Substances Act, as alleged in Counts One, Four through Seven, and Nine through Sixteen, each defendant shall forfeit to the United States of America:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and
- b. any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

3. The property to be forfeited includes, but is not limited to, the following:

- a. \$30,000,000, in that such sum in aggregate was furnished or intended to be furnished in exchange for controlled substances and constitutes proceeds traceable to such exchanges and was used or intended to be used to facilitate a violation of the Controlled Substances Act;
- b. \$64,938.79 in United States funds, seized on June 4, 2010;
- c. \$7,160 in United States currency, seized on March 27, 2009;
- d. Real property located at 4210 Clarkdale Road, Baltimore, Maryland;
- e. Real property located at 2151 Trinity Road, Glen Ellen, California; and

f. Real Property identified as Map 13, Section 1, legal description 73X20, Block 3675, Lots 30A, Assessment Area 2, located to the rear of the 3900 block of Keswick Road, Baltimore, Maryland.

Money Laundering Forfeiture

4. Pursuant to Title 18, United States Code, Section 982(a)(1), and as a result of the offenses set forth in Counts Two, Three and Eight, each defendant shall forfeit to the United States of America all property, real or personal, involved in such offense, and all property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

- a. A sum of money equal to the value of any property involved in the money laundering offenses for which the defendant(s) have been convicted, which sum shall be at least \$2,750,485.18;
- b. All property constituting the subject matter of the money laundering offenses for which the defendants have been convicted;
- c. All property used to commit or to facilitate the commission of the money laundering offenses for which the defendant(s) have been convicted;
- d. All property listed in Paragraphs 3(b)-(f).

Substitute Assets

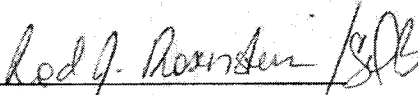
5. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendants up to the value of the property charged with forfeiture in paragraph above it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), up to the value of \$30,000,000.

21 U.S.C. § 853
18 U.S.C. § 982(a)(1)


Rod J. Rosenstein
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED


Foreperson


Date

UNITED STATES DISTRICT COURT

for the
District of MarylandRECEIVED
USMS WARRANTS
BALTIMORE, MD

2010 DEC 21 A 2:47

United States of America
v.

Case No. RWT 10-cr-0777

Matt Nicka, a/k/a Anthony Thacker, a/k/a Grump,
a/k/a Matt Smith, a/k/a Matt St. John, a/k/a Morrow,
a/k/a Calvin Bartlett*Defendant*

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) Matt Nicka, a/k/a Anthony Thacker, a/k/a Grump,
a/k/a Matt Smith, a/k/a Matt St. John, a/k/a Morrow, a/k/a Calvin Bartlett

who is accused of an offense or violation based on the following document filed with the court:

☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice

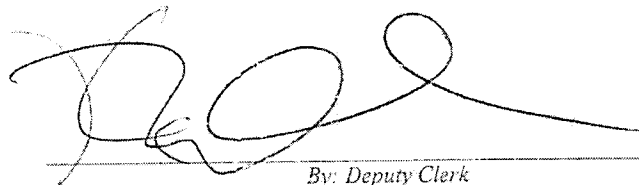
This offense is briefly described as follows:

21:846 Conspiracy to Distribute and Possess with Intent to Distribute 1000 Kilograms or More of Marijuana

21:853 Forfeiture

Date: December 16, 2010

City and state: Greenbelt, Maryland


 By: Deputy Clerk

Felicia C. Cannon, Clerk, U.S. District Court

Name and Title of Issuing Officer

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____

Date: _____

Arresting officer's signature

Printed name and title

RECEIVED
USMS WARRANTS
BALTIMORE, MD

2010 DEC 21 A 2:47

UNITED STATES DISTRICT COURT

for the
District of MarylandUnited States of America
v.

Case No. RWT 10-cr-0777

Gretchen Peterson, a/k/a Bella
Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
 (name of person to be arrested) Gretchen Peterson, a/k/a Bella
 who is accused of an offense or violation based on the following document filed with the court:

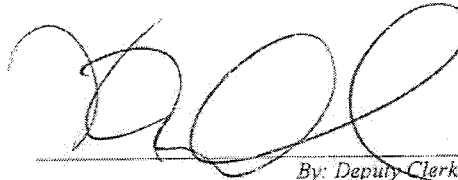
- ☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

21:846 Conspiracy to Distribute and Possess with Intent to Distribute 1000 Kilograms or More of Marijuana

21:853 Forfeiture

Date: December 16, 2010



By: Deputy Clerk

City and state: Greenbelt, Maryland

Felicia C. Cannon, Clerk, U.S. District Court

Name and Title of Issuing Officer

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____

Date: _____
 Arresting officer's signature

Printed name and title